# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION CASE NO. 5:20-CV-230-BO

CAMERON CAIN-BAARBÉ, individually and	)
as the representative of the ESTATE OF	)
ALEXANDER PINCZOWSKI; JAMES	)
PALMER CAIN; and HELEN REVELLE CAIN;	)
,	)
RON GREENFIELD; PNINA GREENFIELD;	)
LIRON SHALOM GREENFIELD; SHERE	)
GREENFIELD; GILI GREENFIELD; and SHYE	)
GREENFIELD;	)
,	)
CARYN OR TSADOK ORBACH and URI	)
ORBACH, individually and as the	)
representatives of the ESTATE OF EREZ	)
ORBACH and on behalf of their minor children	)
A.O., E.O., and O.O.; EITAN ORBACH; and	)
ALON ORBACH;	)
	)
EYTAN YAIR RUND and TAMAR BRACHA	)
RUND, individually and on behalf of their minor	)
children S.A.R., H.H.R., and Y.M.R.;	)
2.000, 200 20120, 22122120, 4120 2 1212120,	)
NITZACHYA GOLDMAN, individually and as	)
the representative of the ESTATE OF	)
AVRAHAM GOLDMAN; GILA	)
NISSENBAUM; NATAN GOLDMAN; MAYA	)
GOLDMAN COHEN; SHARON GOLDMAN	)
NAJMAN; YOSEF GOLDMAN; ISRAEL	)
GORENZKY; and TAMAR CHORESH;	)
CONET (ZIII), and IT IN IT CITOTESII,	)
BEATRIZ GONZALEZ, individually and as the	)
representative of the ESTATE OF NOHEMI	)
GONZALEZ; JOSE HERNANDEZ; REY	)
GONZALEZ; and PAUL GONZALEZ,	)
001,21,122, <b>m.u</b> 11102 001,211222,	)
Plaintiffs,	)
	)
V.	)
	)
THE SYRIAN ARAB REPUBLIC,	)
,	)
Defendant	ĺ

# **MOTION TO WITHDRAW AS COUNSEL**

NOW COMES Christopher S. Battles ("Mr. Battles") formerly of Shanahan Law Group, PLLC, counsel to Plaintiffs, and hereby moves the Court to withdraw as counsel for Plaintiffs. In support of his motion, Mr. Battles shows the Court as follows:

- 1. Mr. Battles entered his appearance on June 2, 2020 as counsel for Plaintiffs.[ECF No.36]
- 2. Mr. Battles left the firm of Shanahan Law Group, PLLC and the above captioned matter will continue to remain with Shanahan Law Group, PLLC and The Berkman Law Office, PLLC. As such, Kieran J. Shanahan and Robert J. Tolchin will remain as counsel for Plaintiffs.
- 3. Default was entered against Defendant The Syrian Arab Republic on February 25, 2022. [ECF No. 55]
- 4. This motion is made in good faith and will not be prejudicial to any parties or delay the proceedings.

WHEREFORE, Mr. Battles prays the Court to grant his withdrawal as counsel for Plaintiffs.

This the 26th day of July, 2022.

# SHANAHAN LAW GROUP, PLLC

By:

/s/ Christopher S. Battles

Kieran J. Shanahan, NCSB# 13329 Christopher S. Battles, NCSB# 42682

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Raleigh, North Carolina 27601

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kieran@shanahanlawgroup.com

 $\underline{cbattles@shananlawgroup.com}$ 

Local Rule 83.1 Counsel Attorneys for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **Motion to Withdraw as Counsel** was electronically filed this 26th day of July, 2022 with the Clerk of Court using the CM/ECF system. Parties may access this filing through the Court's Electronic Filing System. A copy has been placed in the United States Mail, First Class, postage prepaid and addressed as follows:

The Syrian Arab Republic c/o Foreign Minister Walid al-Muallem Ministry of Foreign Affairs Next to al-Assad University Hospital Next to Presidency of the Counsel of Ministers Building Kafar Soussa, Damascus Syria

## SHANAHAN LAW GROUP, PLLC

By: /s/ Kieran J. Shanahan

Attorney for Plaintiffs

Kieran J. Shanahan, NCSB# 13329 Christopher S. Battles, NCSB# 42682 128 E. Hargett Street, Suite 300 Raleigh, North Carolina 27601 Telephone: (919) 880-8258 kieran@shanahanlawgroup.com cbattles@shanahanlawgroup.com Local Rule 83.1 Counsel

Of counsel:

Robert J. Tolchin, NY Reg.# 2546596 The Berkman Law Office, PLLC 111 Livingston Street, Suite 1928 Brooklyn, New York 11201 Telephone: (718) 855-3627 rtolchin@berkmanlaw.com